

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

LIBERTY MUTUAL PERSONAL  
INSURANCE COMPANY; LM GENERAL  
INSURANCE COMPANY; AMERICAN  
ECONOMY INSURANCE COMPANY; and  
SAFECO INSURANCE COMPANY OF  
ILLINOIS,

Plaintiffs,

v.

ACCURATE CARE, L.L.C.; NOVAMED  
L.L.C.; COMPLETE FITNESS & RHB,  
LLC; NERVEANA, LLC; NON OPIOID  
RELIEF LLC; TRANSCARE DETROIT  
INC; and ALLAN SCHWARTZ, D.O.,

Defendants.

C.A. No. 4:24-cv-12830-FKB-KGA

**STIPULATION OF DISMISSAL WITH PREJUDICE  
AS TO ALL DEFENDANTS**

Pursuant to Fed. R. Civ. P. 41(a)(1), it is hereby stipulated and agreed by and between plaintiffs Liberty Mutual Personal Insurance Company, LM General insurance Company, American Economy Insurance Company, and Safeco Insurance Company of Illinois (collectively, “Liberty Mutual”) and defendants Accurate Care, L.L.C., Novamed L.L.C., Complete Fitness & RHB, LLC, Nerveana, LLC, Non Opioid Relief LLC, Transcare Detroit Inc, and Allan Schwartz, D.O. (collectively,

the “defendants”) by and through their undersigned counsel, that Liberty Mutual’s Complaint (*ECF No. 1*) be dismissed with prejudice as to the defendants, without costs or fees of any kind to any party. It is hereby agreed by and between Liberty Mutual and the defendants that this Court shall retain jurisdiction to enforce the terms of settlement reached between Liberty Mutual and the defendants.

STIPULATED AND AGREED TO THIS 16th DAY OF JUNE, 2025:

<p><i>Liberty Mutual Personal Insurance Company, LM General Insurance Company, American Economy Insurance Company, and Safeco Insurance Company of Illinois,</i></p> <p>By their Attorneys,</p> <p>/s/ <u>Andrew H. DeNinno</u> Andrew H. DeNinno (P87678) <a href="mailto:adeninno@ktmpc.com">adeninno@ktmpc.com</a> Brad A. Compston <a href="mailto:bcompston@ktmpc.com">bcompston@ktmpc.com</a> KTM 38777 Six Mile Road, Suite 314 Livonia, MI 48152 (734) 521-9000</p>	<p><i>Accurate Care, L.L.C., Novamed, L.L.C., Complete Fitness &amp; RHB, LLC, Nerveana, LLC, Non Opioid Relief, LLC, Transcare Detroit, Inc., and Allan Schwartz, D.O.,</i></p> <p>By their Attorneys,</p> <p>/s/ <u>Nathan J. Fink</u> Nathan J. Fink (P75185) <a href="mailto:nfink@finkbressack.com">nfink@finkbressack.com</a> 38500 Woodward Avenue, Suite 350 Bloomfield Hills, MI 48304 (248) 971-2500</p>
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**STIPULATED ORDER OF DISMISSAL WITH PREJUDICE  
AS TO ALL DEFENDANTS**

This matter having come before the Court upon stipulation of the parties, and  
the Court being otherwise fully advised in the premises:

IT IS HEREBY ORDERED that plaintiffs' causes of action against  
defendants Accurate Care, L.L.C., Novamed L.L.C., Complete Fitness & RHB,  
LLC, Nerveana, LLC, Non Opioid Relief LLC, Transcare Detroit Inc, and Allan  
Schwartz, D.O. are hereby dismissed with prejudice and without costs to any party.

The Court shall retain jurisdiction over this matter to enforce the terms of settlement reached between these parties.

IT IS SO ORDERED.

Dated: June 17, 2025

s/F. Kay Behm  
F. Kay Behm  
United States District Judge